

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FOX VALLEY & VICINITY)	
CONSTRUCTION WORKERS PENSION)	
FUND, <i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 11 C 3435
vs.)	
)	JUDGE SAMUEL DER-YEGHIAYAN
RED 5 MASONRY, INC., an Illinois)	
corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, RED 5 MASONRY, INC., an Illinois corporation, in the total amount of \$31,179.00, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,181.25.

On May 31, 2011, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on June 21, 2011. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiffs
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 7th day of July 2011:

Mr. Earl Sund, Registered Agent
Red 5 Masonry, Inc.
10941 Wing Pointe Drive
Huntley, IL 60142

/s/ Patrick N. Ryan

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